

Richard J. Cooper, Esq.
Luke A. Barefoot, Esq.
CLEARY GOTTLIEB STEEN & HAMILTON LLP
One Liberty Plaza
New York, New York 10006
Telephone: 212-225-2000
Facsimile: 212-225-3999

*Attorneys for the Foreign Representative
of Odebrecht Engenharia e Construção S.A.
and its affiliated debtors*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Odebrecht Engenharia e Construção S.A., *et al.*¹

Debtors in a Foreign Proceeding

Chapter 15

Case No. 20-12741

(Joint Administration Pending)

**STATEMENT OF FOREIGN REPRESENTATIVE IN SUPPORT OF
CHAPTER 15 PETITION FORrecognition OF FOREIGN PROCEEDING**

I, Adriana Henry Meirelles, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury under the laws of the United States, as follows:

1. I am the Investor Relations Officer at Odebrecht Engenharia e Construção S.A. (“OEC” or the “Company”) and authorized foreign representative (in such capacity, the “Petitioner”) of OEC, CNO S.A., OECI S.A. (the “Debtors”) in a foreign proceeding (the “Brazilian EJ Proceeding”) pursuant to Federal Law 11.101 of February 9, 2005 (the “Brazilian Bankruptcy Law”) of the laws of the Federative Republic of Brazil (“Brazil”).

¹ The Debtors in these chapter 15 cases (the “Chapter 15 Cases”) and the last four identifying digits of the tax number in the jurisdiction are: Odebrecht Engenharia e Construção S.A. (Brazil – 01-28); CNO S.A. (Brazil – 01-82); OECI S.A. (Brazil – 01-78).

2. I respectfully submit this statement, as required under section 1515(c) of title 11 of the United States Code (the “Bankruptcy Code”), in support of the *Verified Petition for Recognition Under Chapter 15 for an Order Granting Recognition and Final Relief in Aid of a Foreign Proceeding* to 11 U.S.C. §§ 105(A), 1515, 1517, 1520(A) and 1521 (the “Verified Petition”) filed concurrently herewith by the Petitioner seeking recognition by this Court of the Brazilian EJ Proceeding as a foreign main proceeding.²

3. Pursuant to the requirements of section 1515(c) of the Bankruptcy Code, to the best of my knowledge, the extrajudicial reorganization proceeding commenced on August 19, 2020 in the First São Paulo Bankruptcy and Reorganization Court of the Fórum Central Cível of the Appellate Court of the State of São Paulo, is the only insolvency proceeding of any kind with respect to the Debtors and, thus, is the only known “foreign proceeding” with respect to the Debtors as that term is defined in section 101(23) of the Bankruptcy Code.

[*Remainder of page left intentionally blank*]

² Although the Petitioner is confident that the Brazilian EJ Proceeding is a foreign main proceeding within the definition of section 1502(4) of the Bankruptcy Code, in an abundance of caution, the Petitioner reserves the right to argue, in the alternative, that the Brazilian EJ Proceeding is a foreign non-main proceeding within the definition of section 1502(5) of the Bankruptcy Code and to seek appropriate relief under Bankruptcy Code section 1521 and any other applicable provision of the Bankruptcy Code.

Executed at Sao Paulo, Brazil
on November 24, 2020

/s/ Adriana Henry Meirelles

Adriana Henry Meirelles, Investor
Relations Officer and Authorized
Foreign Representative of the Debtors